

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA

v.

Criminal No. 3:23cr16

CRAIG ZAHRADNIK

**MOTION FOR PRELIMINARY ORDER OF CRIMINAL FORFEITURE
AGAINST CRAIG ZAHRADNIK**

AND NOW comes the United States of America, by and through its counsel, Eric G. Olshan, United States Attorney for the Western District of Pennsylvania, and Jill L. Locnikar, Assistant United States Attorney for the Western District of Pennsylvania, and pursuant to Federal Rule of Criminal Procedure 32.2, respectfully moves for a preliminary order of forfeiture, and in support thereof, represents as follows:

1. On December 11, 2023, Craig Zahradnik ("Zahradnik") entered a guilty plea to Counts One, Two, Three, Six, Seven, Eight, and Nine of the Information at Criminal No. 23-16. Miller also agreed to forfeit all right, title, and interest in the following property (the "Subject Property") to the United States, pursuant to 18 U.S.C. § 924(d); 26 U.S.C. § 5872(a); and 28 U.S.C. § 2461(c):

- (a) Two Polymer 80 handguns, Privately Made Firearm, Model PF940SC, 9mm, no serial number;
- (b) Two black silencers;
- (c) Pioneer Arms machinegun, Model PPS43-C, 7.62x25 caliber, serial number S/N: MA00877P;
- (d) Polymer 80 handgun, Privately Made Firearm, Model PF940C, 9mm, no serial number;
- (e) Polymer 80 handgun, Privately Made Firearm, Model PF940V2, 9mm, no serial number;
- (f) Two black silencers;
- (g) Three Polymer 80 handguns, Model PF940C, 9mm, no

- serial number;
- (h) Five short barrel rifles, Privately Made Firearm, multi-caliber, no serial number;
- (i) Rifle, Privately Made Firearm, multi-caliber, no serial number;
- (j) Four black silencers;
- (k) Silver silencer;
- (l) Machine gun conversion device;
- (m) Three rifles, Privately Made Firearm, multi-caliber, no serial number;
- (n) Smith & Wesson, Model M&P Shield, .40 caliber, S/N HVL1460;
- (o) Taurus pistol, Model Tracker, .22 caliber, S/N: DW292557;
- (p) Glock pistol, Model 30, .45 caliber pistol, S/N: SKA581;
- (q) SCCY Industries pistol, Model CPX-2, 9mm caliber, S/N: C290238;
- (r) Two machine gun conversion devices;
- (s) Two black silencers;
- (t) Silver silencer;
- (u) Ruger rifle, Model Mini 14, .223 caliber, S/N: 180-26007;
- (v) Remington Arms shotgun, Model 870 Express Magnum, 12-gauge caliber, S/N: D276446M;
- (w) Anderson Manufacturing rifle, Model AM-15, multi-caliber, S/N: 19217409;
- (x) Ruger rifle, Model Precision, .308 caliber, S/N: 1800-38440;
- (y) Anderson Manufacturing rifle, Model AM-15, multi-caliber, S/N: 19217412;
- (z) Palmetto State Armory rifle, Model G3-10, multi-caliber, S/N: G315943;
- (aa) Remington Arms shotgun, Model 12, 12-gauge caliber, S/N: PC157817;
- (bb) Magnum Research Inc. pistol, Model Desert Eagle 1911G, .45 caliber, S/N: 0027216;
- (cc) Sig-Sauer pistol, Model P365, 9mm caliber, S/N: 66A410800;
- (dd) Ruger rifle, Model American, unknown caliber, S/N: 690-41396;
- (ee) Smith & Wesson rifle, Model 9478, unknown caliber, S/N: SY45087;
- (ff) Savage shotgun, Model 9478, 12-gauge caliber, S/N: D995954;
- (gg) Mossberg shotgun, Model 535, 12-gauge caliber, S/N: AT026277;
- (hh) Remington Arms rifle, Model 710, 30-06 caliber, S/N: 71209444;
- (ii) Mossberg shotgun, unknown model, unknown caliber, S/N: MV32328V;
- (jj) Auto Ordnance handgun, Model 1911, .45 caliber, S/N: A0C48753;

- (kk) Ruger rifle, American, unknown caliber, S/N: 693-28111;
- (ll) Winchester shotgun, Model 1400, 12-gauge caliber, S/N: N565896;
- (mm) Colt revolver, unknown model, .38 caliber, S/N: 568098;
- (nn) Colt revolver, Model Official Police, .22 caliber, S/N: 36950;
- (oo) Henry Repeating rifle, Model H006 Big Boy, .44 caliber, S/N: BB0097472;
- (pp) Henry Repeating rifle, Model Silver Eagle, .22 caliber, S/N: SE002970;
- (qq) Winchester rifle, Model 94, 30-30 caliber, S/N: 5030131;
- (rr) Ruger rifle, Model Marlin 1895, 45-70 caliber, S/N: RM0008029;
- (ss) Benelli shotgun, Model M4, 12-gauge caliber, S/N: Y109216E19;
- (tt) Benelli shotgun, Model M4, 12-gauge caliber, S/N: Y110970F19;
- (uu) Remington shotgun, Model 870, 12-gauge caliber, S/N: RS18749Y;
- (vv) Remington shotgun, Model 870, 12-gauge caliber, S/N: RS46079X;
- (ww) FN Herstal rifle, Model PS90, 5.7x28 caliber, S/N: FN110846;
- (xx) Sig Sauer rifle, Model 7161 Tread, 7.62 caliber, S/N: 23D009145;
- (yy) FN Herstal pistol, Model Five-Seven, 5.7x28 caliber, S/N: 386307306;
- (zz) Benelli shotgun, Model M4, 12-gauge caliber, S/N: Y112220M19;
- (aaa) Kahr Arms pistol, Model 191 1A1, .45 caliber, S/N: AOA51307;
- (bbb) Colt rifle, Model Carbine, 5.56 caliber, S/N: CR061403;
- (ccc) Remington shotgun, unknown model, 12-gauge caliber, S/N: RAF001504;
- (ddd) Colt pistol, Model 1911, .45 caliber, S/N: SCS338;
- (eee) Glock pistol, Model 19, 9mm caliber, S/N: AFCG102;
- (fff) Girsan pistol, Model MC 1911 S, .45 caliber, S/N: T6368-22DV00341;
- (ggg) PTR pistol, Model PTR91, 9mm caliber, S/N: 9MC014001;
- (hhh) Fabrica D'Arm revolver, Model Eliminator, .357 caliber, S/N: E082584;
- (iii) PTR pistol, Model PTR91, 9mm caliber, S/N: 9MC013904;
- (jjj) Radical Firearms rifle, Model RF-15, multi-caliber, S/N: 21- 026116;

- (kkk) Ruger rifle, Model Hightower HTA 90/22, .22 caliber, S/N: unknown;
- (lll) Glock pistol, Model 43, 9mm caliber, S/N: AFEZ867;
- (mmm) \$1,000 in U.S. Currency.
- (nnn) Three short barrel rifle, Privately Made Firearm, multi-caliber, no serial number;
- (ooo) Two Polymer 80 handgun, Privately Made Firearm, 9mm, no serial number;
- (ppp) Three black silencers;
- (qqq) Seven short barrel rifles, Privately Made Firearm, multi-caliber, no serial number;
- (rrr) Five rifles, Privately Made Firearm, multi-caliber, no serial number;
- (sss) Four machine gun conversion devices - drop-in auto sear;
- (ttt) Three Machine gun conversion devices - Glock switch;
- (uuu) Nine Polymer 80 handgun Privately Made Firearm kits;
- (vvv) Ammunition; and
- (www) a 2019 GMC Sierra Truck, bearing Pennsylvania Registration ZRB3722 and Vehicle Identification Number (VIN): 3GTP9EEL1KG200940.

2. The United States respectfully requests that the Court enter a Preliminary Order of Criminal Forfeiture and that the forfeiture of Zahradnik's interest in the Subject Property be incorporated into his sentence and judgment pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure.

3. Upon the issuance of the Preliminary Order of forfeiture against Zahradnik, the United States will provide written notice to all third parties, if any, known to the United States who may have an interest in the Subject Property. The United States will also advertise notice of this forfeiture proceeding via the government's internet forfeiture website.

WHEREFORE, the United States respectfully requests that this Honorable Court enter a Preliminary Order of Criminal Forfeiture forfeiting to the United States all right, title, and interest of the defendant in the Subject Property, and that the forfeiture of the defendant's interest in the Subject Property be incorporated into his sentence and judgment.

Respectfully submitted,

ERIC G. OLSHAN
United States Attorney

/s/ Jill L. Locnikar
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CERTIFICATE OF SERVICE

I hereby certify that the United States' Motion for Preliminary Order of Criminal Forfeiture against Craig Zahradnik has been served through the electronic filing system this 15th day of December, 2023, upon the following:

Robert S. Carey, Jr., Esquire
careymrc@yahoo.com

/s/ Jill L. Locnikar

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